

Exhibit O

IN THE MATTER OF COEYMANS MARINE TOWING, LLC., ET AL.
Cannon Moss on 06/04/2025

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 Norfolk Division

4 In Admiralty

5
6 In The Matter of COEYMANS)
7 MARINE TOWING, LLC D/B/A)
8 CARVER MARINE TOWING as Owner) CIVIL ACTION NO.
9 and Operator OF M/T MACKENZIE) 2:24-cv-00490
10 ROSE (IMO NO. 8968765) her)
11 cargo, engines, boilers,)
12 tackle, equipment, apparel,)
13 and appurtenances, etc. in)
14 rem, petitioning for)
15 Exoneration from or Limitation))
16 of Liability in allision with)
17 Norfolk and Portsmouth Belt)
18 Line Railroad Company Main)
19 Line Railroad Bridge)
20 occurring June 15, 2024 in)
21 and about the Elizabeth River,))
22 Virginia.)

23
24 DEPOSITION UPON ORAL EXAMINATION
25 OF CANNON MOSS
26 TAKEN ON BEHALF OF THE PETITIONER

27 Norfolk, Virginia

28 June 4, 2025

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1 Q. You talked about communication after
2 the allision on June 15, 2024, people you talked
3 to, people who talked to you. Do you recall that
4 discussion?

5 A. Yes.

6 Q. Did anyone from Carver contact you
7 to tell you that they had struck the mainline
8 bridge?

9 A. No. We didn't get a phone call
10 from Carver or the Coast Guard. We're the ones
11 that notified the Coast Guard on Monday that it
12 had been struck, and the only reason that we knew
13 it was Carver, because it hit and took off to New
14 York, is they have AIS data tracking on their
15 tugboat, so it's a publicly available website -- I
16 guess you can pay for it too -- so I went on --
17 Monday night when we found out and I was able to
18 pull the history and see the AIS data for the
19 MACKENZIE ROSE, it hit and took off.

20 MR. SNOW: Those are all the questions I
21 have.

22

23 EXAMINATION

24 BY MR. ROMAN:

25 Q. With that discussion with the engineers